

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

LOUIS KWAME FOSU,

Plaintiff,

v.

THE UNIVERSITY OF RHODE ISLAND,
UNIVERSITY OF RHODE ISLAND BOARD
OF TRUSTEES, DAVID M. DOOLEY,
PRESIDENT, THE UNIVERSITY OF
RHODE ISLAND, DONALD DEHAYES,
PROVOST AND VICE PRESIDENT FOR
ACADEMIC AFFAIRS, AND JEANNETTE
E. RILEY, DEAN, COLLEGE OF ARTS &
SCIENCES, in their individual and official
capacities,

Defendants.

C.A. No. 21-cv-279-JJM-PAS

JOINT MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER

Pursuant to Federal Rule of Civil Procedure 26(c), Plaintiff and Defendants move the Court for the entry of the Agreed Confidentiality Order (“Confidentiality Order”), attached as Exhibit A, and state as follows in support of their request:

1. The parties are engaged in document discovery, and they are meeting and conferring regarding the scope of the requested documents.
2. As part of their “meet and confer” discussions, the parties have agreed that good cause exists for the entry of the Confidentiality Order, which will facilitate Defendants’ production of a significant number of documents.
3. The parties jointly participated in the drafting of the Confidentiality Order and have agreed to the form attached hereto.

4. The Confidentiality Order delineates the standards and process to designate a document as subject to its terms and allows the non-producing party to challenge a designation through a “meet and confer” process initially and a request for the Court’s review, if necessary.

5. In the interests of expediting the completion of document discovery and furthering the commencement of depositions, the parties request that the Court enter the Confidentiality Order for purposes of this litigation.

The parties are available to confer with the Court if there are any questions or concerns pertaining to the Confidentiality Order.

Plaintiff,

By His Attorneys,

/s/ Jessica Sanderson
/s/ Ameer Gopalani
/s/ Mark P. Gagliardi
Jessica Sanderson (Admitted *Pro Hac Vice*)
Ameer Gopalani (Admitted *Pro Hac Vice*)
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Dated: November 23, 2022

Defendants,

By Their Attorney,

/s/ Steven M. Richard
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Dated: November 23, 2022